

Maranda E. Fritz
 MARANDA E. FRITZ PC
 521 Fifth Avenue 17th Floor
 New York, New York 10175
 Phone: 646 584-8231
 Email: maranda@fritzpc.com
 Counsel for Alpine Securities Corporation and Joseph Walsh

**UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

UNITED STATES SECURITIES AND
 EXCHANGE COMMISSION,

Plaintiff,

v.

ALPINE SECURITIES CORPORATION,
 CHRISTOPHER DOUBEK, and JOSEPH
 WALSH,

Defendants.

Civil No. 2:22-CV-01279-RFB-MDC

**ALPINE SECURITIES' UNOPPOSED
 MOTION TO AMEND SCHEDULING
 ORDER (FOURTH REQUEST)**

Pursuant to Local Rules ("LR") 6-1 and 26-3, and the Court's Stipulated Discovery Plan and Scheduling Order dated September 15, 2023, Dkt. No. 41 at ¶ 10 (the "Scheduling Order"), Defendant Alpine Securities Corporation respectfully submits this motion to extend current deadlines related to dispositive motions. Plaintiff, the United States Securities and Exchange Commission has informed Alpine that it does not oppose the relief sought in this motion but is prepared to move forward under the current deadlines. Alpine has reached out but has not heard back from Defendant Christopher Doubek regarding whether he opposes the motion. This is the fourth request for an extension.

This extension is requested because an issue has arisen with Snell and Wilmer and they are withdrawing as local counsel for defendants Alpine Securities and Joseph Walsh. The deadline for dispositive motions is currently set for this Thursday, September 26, 2024, and undersigned counsel requests a two-week extension to identify new local counsel and have them assist in the preparation and filing of defendants' motion for summary judgment. The SEC has indicated that it would not

1 object to Alpine filing its motion without local counsel and has further stated that Alpine's local
2 counsel does not appear to have been involved in discovery in this matter for many months and did
3 not attend any depositions. The SEC has indicated that it believes a more appropriate remedy would
4 be for Alpine and Mr. Walsh to file any motion for summary judgment under the current deadlines
5 and be permitted time to obtain new local counsel with whom to affiliate.

6 Alpine believes that a two-week extension is appropriate and requests an extension to the
7 following paragraphs of the Amended Scheduling Order (Dkt. No. 73), with the proposed extension
8 dates also set forth below:

9 6. Dispositive motion deadline: October 10, 2024; oppositions due October 31, 2024;
10 replies due November 21, 2024.¹

11 7. Pretrial order. The deadline for the parties to file a joint pretrial order is November 10,
12 2024, 30 days after the dispositive-motion deadline. However, if dispositive motions are filed, the
13 deadline for filing the joint pretrial order will be suspended until 30 days after decision on the
14 dispositive motions, unless otherwise ordered by the Court.

15 For the reasons set forth above, Defendant Alpine Securities Corporation respectfully
16 submits that there is good cause to amend the scheduling order in this matter. A proposed order
17 amending the pertinent dates of the Amended Scheduling Order is included.

18 DATED this 24th day of September, 2024.

19 /s/ Maranda E. Fritz

MARANDA E. FRITZ PC

521 FIFTH AVENUE 17TH FLOOR

NEW YORK, NEW YORK 10175

PHONE: 646 584-8231

EMAIL: MARANDA@FRITZPC.COM

Counsel for Alpine Securities Corporation and
23 Joseph Walsh

24
25
26
27 ¹ Although the Scheduling Order only contains a deadline for the filing of dispositive motions, to
28 accommodate scheduling issues that would arise with this extension, we request that the Court
extend the standard briefing time for replies by ordering these dates.

CERTIFICATE OF SERVICE

I hereby certify that the foregoing was filed with the Court on September 24, 2024, through the CM/ECF system, which will electronically notify all counsel of record and pro se parties authorized to receive electronic notifications.

/s/ Maranda E. Fritz

Maranda E. Fritz

MARANDA E. FRITZ PC